

Robert M. Bownes III

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United States Federal Communications Commission
445 12th Street SW
Washington, DC 20554, USA

To: The Federal Communications Commission

Re: RM-10867 through RM-10870

I would like to take the time today, as both a communications professional and as a licensed amateur radio operator, to comment on the proposals RM-10867, 10868, 10869, and 10870 currently before the Commission.

First, it is my belief that the time has come to re-evaluate the Morse code requirement for amateur radio. The Morse requirement has, as you well know, been placed by the ITU solely in the hands of the national administrators. This watershed event provides you with the ability to further enhance and expand the use of amateur radio within the US. As a communications professional, I feel I must give a sincere endorsement to any such effort.

While the ITU has release the Morse code requirement completely, many feel it is an integral part of amateur radio. You currently have before you a number of proposals stating just that. I feel that I agree with a basic requirement to retain Morse code at some level within the licensing structure and thusly recommend against further consideration of RM-10870. But to tie the code requirement to an arbitrary 30mhz 'dividing line', as is currently the structure, is in error.

The most sensible proposals retain a Morse code requirement while releasing portions of the allocated HF spectrum to non Morse speakers. It is my further belief that RM-10867 from the ARRL is the most sensible of the proposals currently before the Commission and I strongly recommend and endorse its adoption.

The remaining proposals, RM-10868 and RM-10869, while maintaining a code requirement are either overly complex, mixing too many changes in a single proposal, or suggest a return to the past with a somewhat onerous 13 word per minute requirement. This 13 word per minute requirement was long debated and discarded previously. As such, I must, regrettably, indicate that I feel these petitions simply go too far.

Thank you for your time and consideration.

Sincerely,

Robert M. Bownes III
KC2GDG